

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

LARGAN PRECISION CO., LTD.,

Plaintiff,

v.

**ABILITY OPTO-ELECTRONICS
TECHNOLOGY CO., LTD.;
NEWMAX TECHNOLOGY CO., LTD.; AND
HP INC.**

Defendants.

Case No. 4:19-cv-00696-ALM

**DECLARATION OF SASHA G. RAO IN SUPPORT OF
DEFENDANT HP INC.'S MOTION TO TRANSFER
TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Sasha G. Rao, declare:

1. I am an attorney duly licensed to practice law before the United States District Court for the Eastern District of Texas. I am a partner of the law firm Maynard Cooper & Gale LLP, attorneys of record for Defendant HP, Inc. (“HP”) in the above-styled lawsuit. The facts stated herein are true and correct and of my personal knowledge, and if called and sworn as a witness, I could and would competently testify thereto under oath.

2. Attached hereto as Exhibit 1 is a true and correct copy of a printout depicting Genius Electronic Optical Co., Ltd.’s office located at address 20045 Stevens Creek Blvd., Building D, Suite 1-E, Cupertino, CA 95014 obtained from the website www.gseo.com/en/contact/contact.php.

3. Attached hereto as Exhibit 2 is a true and correct copy of HP’s Subpoena *Duces Tecum* to Apple, Inc. pursuant to Rule 45 of the Federal Rules of Civil Procedure, served on February 17, 2020.

4. Attached hereto as Exhibit 3 is a true account of the court docket for *Largan Precision Co., Ltd. v. Genius Electronic Optical Co., Ltd.*, No. 3:13-cv-02502 (N.D. Cal), filed on June 4, 2013, obtained from a search I conducted on PACER.

5. Attached hereto as Exhibit 4 is a true account of the court docket for *Largan Precision Co., Ltd. v. Fujinon Corp.*, No. 4:10-cv-01318 (N.D. Cal), filed on March 29, 2010, obtained from a search I conducted on PACER.

6. Attached hereto as Exhibit 5 is a true account of the court docket for *Largan Precision Co., Ltd. v. Samsung Electronics Co., Ltd. et al*, No. 3:13-cv-02740 (S.D. Cal), filed on November 14, 2013, obtained from a search I conducted on PACER.

7. Attached hereto as Exhibit 6 is a true and correct copy of U.S. Federal Court Management Statistics, which include the Judicial Caseload Profiles for the Northern District of California and the Eastern District of Texas, with the most recent available data from the September 30, 2019 report. I obtained this report from <https://www.uscourts.gov/federal-court-management-statistics-september-2019>.

I declare under penalty of perjury under the laws of the State of Texas and the United States of America that the foregoing is true and correct.

Executed this 1st day of March, 2020, in San Francisco, California.



Sasha G. Rao